

236596

**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

**ENTERED  
Office of Proceedings  
September 5, 2014  
Part of  
Public Record**

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**35853**  
Docket No. FD ~~38853-0~~

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**SEA-3, INC. –EMERGENCY PETITION  
FOR DECLARATORY ORDER**

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**MOTION FOR EXTENSION OF TIME**  
\_\_\_\_\_

**Robert B. Culliford  
Boston and Maine Corporation/  
Springfield Terminal Railway Company  
1700 Iron Horse Park  
North Billerica, MA 01862**

**September 5, 2014**

***Counsel for Boston and Maine  
Corporation/Springfield Terminal Railway  
Company***

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SURFACE TRANSPORTATION BOARD**

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**MOTION FOR EXTENSION OF TIME**

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On August 22, 2014, the Boston and Maine Corporation and Springfield Terminal Railway Company (collectively “Pan Am”) submitted a Petition for Leave to Intervene in Support of the Emergency Petition for Declaratory Order filed by Sea-3, Inc. (“Sea-3”) on August 4, 2014 and for Leave to File More Substantive Arguments at a Later Date (the “Petition”), which was granted by the Board on August 29, 2014. Since Pan Am’s filing of the Petition, Sea-3 and the City of Portsmouth (“Portsmouth”) have engaged in discussions regarding a possible resolution of this matter, and on September 4, 2014 Portsmouth presented Sea-3 with a written proposal. Sea-3 is currently reviewing that proposal and is not yet in a position to comment on its terms, though further discussions are likely. Therefore, Pan Am respectfully requests that it be granted an extension of time in which to file more substantive

arguments, if necessary, until September 30, 2014. Both Sea-3 and Portsmouth assent to this motion.

Respectfully submitted,



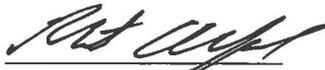
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September 5, 2014

*Counsel for Boston and Maine Corp./ Springfield  
Terminal Railway Co.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of September, 2014, I served a copy of the foregoing Motion for Extension of Time upon all parties of record in this proceeding by electronic mail and first class mail, postage prepaid.

  
Robert B. Culhford